

**Remarks**

Claims 1-38 are pending and at issue in the above identified patent application. Of the claims at issue, claims 1, 16, and 31 are independent. In the Office action, claims 1, 4-7, 9-16, 19-22, and 24-37 were rejected as being unpatentable over Sheridan (US 4,126,854) in view of Jacobson (US 6,445,489). –In light of the forgoing amendments and the following remarks, reconsideration and allowance of the claims are respectfully requested.

Independent claims 1, 16, and 31 have been amended to recite movement of the light beam with respect to the photoconductive layer, wherein the photoconductive layer is related to a non-liquid crystal electrostatic display cell. Moving the light beam with respect to the photoconductive layer allows information to be written onto the electronic paper due to the interaction of the light beam and the conductive layer and the resultant affect on the non-liquid crystal electrostatic display cell.

It is respectfully submitted that neither Sheridan nor Jacobson disclose the movement of a light beam with respect to the photoconductive layer for writing information on electronic paper having a non-liquid crystal electrostatic display cell. Accordingly, no combination of these references can render obvious the pending claims. Further, as addressed in detail below, because Koshimizu is directed to a completely different technology than both of Sheridan and Jacobson, there is no motivation for the combination proposed in the Office action.

Sheridon is directed to a flat panel display technology, such as may be used as an alternative to cathode ray tube displays. (Sheridon, 1:1-24). Sheridan discloses that displays should be thin, which is a significant advantage that flat panel displays have over conventional technology. The flat panel displays of Sheridan are implemented using twisting-bichromatic balls and a conductive grid that is selectively electrified to cause certain areas of balls to change states to display one color or another, thereby changing the information shown on the display. As an alternative, or in addition, to using the conductive grid to address the display, Sheridan indicates that a photoconductive material may be used. (Sheridon, FIG. 7). In particular, Sheridan discloses that light falling on the photoconductive material allows an electric field to rotate the balls to change the displayed colors. Sheridan

does not, however, disclose or suggest that a light beam could or should be moved with respect to the display in order to address the display.

Like Sheridan, Jacobson is directed to a flat panel display technology. As shown in the drawings, Jacobson includes a light emitting layer that is used to address an electrophoretic display. However, Jacobson does not disclose or suggest that a light beam could or should be moved with respect to the display. To the contrary, Jacobson discloses that various portions of the light-emitting layer are selectively powered to impart visual information to the electrophoretic layer. This is consistent with the drawings of Jacobson, which show that light-emitting layer covers the entire surface of the display.

While Koshimizu appears to disclose beam scanning in a system using liquid crystal displays, the structures of Sheridan and Jacobson teach against incorporating the scanning of Koshimizu into their systems. As noted above, Sheridan and Jacobson are directed to flat panel display systems, which, by definition, do not include significant structural depth or thickness. As will be readily appreciated, to scan a light beam across a significant surface area (as in Koshimizu), the light source must be located an appreciable distance from the scanning surface. This is precisely why the scanning of Koshimizu, would not be incorporated into the Sheridan and Jacobson systems; to enable the scanning of Koshimizu, the Jacobson and Sheridan systems would have to be considerably thicker, which is exactly what Jacobson and Sheridan seek to avoid by being flat panel systems. Accordingly, it is respectfully submitted that there is no motivation for the proposed combination of Sheridan, Jacobson, and Koshimizu.

If there is any matter that the examiner would like to discuss, the examiner is invited to contact the undersigned representative at the telephone number set forth below.

Respectfully submitted,

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Mark C. Zimmerman  
Reg. No. 44006  
(312) 580-1020